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Subject: Round 2 Report
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Eric and Chip,

Per Eric's request the following is a rather random dump of issues/data gaps since my last e-mail.

1. Need to establish background levels or range for TZW metals within Pdx Harbor. Manganese and other metals exceed SLVs in TZW at various Pdx Harbor sites. LWG members such as OSM (see Section 12.3.3.1.4 Transition Zone Water) have contended that the measured levels of metals off-shore of their facility are within the range of TZW measured adjacent to other facilities which they interpret to be natural conditions. Given that the TZW investigations conducted by the LWG and facilities such as OSM are at sites that have groundwater plumes, it is not clear what the ambient TZW levels for metals such as manganese may be.
2. Section 12.2.1.2 Lateral Boundary Riparian Zone Soils – EPA previously identified the need for additional soil or near shore sediment data to support a riparian zone ecological risk assessment. The Round 2 Report does not acknowledge this as a Round 3B data need arguing that this the riparian area is outside of the "in-water site". It is my understanding, however, that the LWG had earlier acknowledged this as a data gap and agreed to prepare an FSP.
3. Section 12.2.2 Upstream Contribution and Naturally Occurring Background Concentrations - The report identifies the upstream levels as data from around RM 11 to RM 16 as important for consideration. I agree that data from this upstream reach is significant and is important for risk communication, FS limitations and risk management decisions. It is also important to note that the LWG selectively used background contaminate levels measured in sediment from RM 15.3 to 26 in the Hill Topping exercise. As previously noted, this selective use of background levels instead of contaminant levels in proximal adjacent polygons or upstream (RM 11 to RM 16) will result in a biased high iPRG.
4. Section 12.2.2.5 Biota – The report proposes to use existing background tissue data from 6 small mouth bass composites and three brown bullhead composites. Are these the right species? Intuitively, I would assume that we need background or reference tissue data from all species whose tissue data indicates a risk? Check with Tox group.
5. Page 12-10, Re-evaluation of TPH measures as sediment quality values – It looks like we need to be directive here if we have not already done so.
6. Table 10.5-1 does not identify a direct contact risk for exposure to arsenic from beach soils in iAOPC 14. Yet, the arsenic levels observed in below the Railroad Bridge (Map 11.3.11-7 iAOPC 14) are up to 53.7 mg/Kg which is clearly above background. Why are the arsenic levels here not a concern?

7. Section 12.3.1.3.2 Indeterminate Benthic Toxicity Areas – I will certainly defer to the eco tox group on this, but it is not clear to me the basis for needing to confirm or refute earlier results that tested positive for benthic toxicity. Additional rational appears needed. If the proposed additional testing does not show benthic toxicity are we going to require a third study?

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